

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
5:06CR1
UNDER SEAL

UNITED STATES OF AMERICA

v.

QUENTIN DEMER WILLIS, et al

2006R00047

APPLICATION FOR *EX PARTE* ORDER
FOR DISCLOSURE OF RETURNS AND
RETURN INFORMATION and MOTION
TO SEAL

NOW COMES the United States of America, by and through Gretchen C.F. Shappert, United States Attorney for the Western District of North Carolina, pursuant to 26 U.S.C. § 6103(i)(1) and (4), and makes application for an *ex parte* order directing the Internal Revenue Service (IRS) to disclose to applicant (and others hereinafter named) returns and return information of the following person(s) for the taxable periods 1999 through 2005:

NAME	DATE OF BIRTH	SOCIAL SECURITY #
QUENTIN DEMER WILLIS	11/22/1981	243-35-2870
DARWIN LEWIS TURNER	12/2/1966	245-19-5436 245-19-5437
JERMAL O'RYAN TURNER	11/14/1982	241-39-5453 241-39-6453

The United States of America further moves this Court for an order to seal this application and all future reference to this matter, and that same remain sealed until further order of this Court.

In support of this application, based upon the undersigned's review of the preliminary investigation by the Bureau of Immigration and Customs Enforcement and the Iredell County Sheriff's Department and based on information believed to be reliable, the undersigned applicant states the following:

1. There is reasonable cause to believe that a violation of Title 21, Sections 846 and 841 have occurred. Evidence developed in this investigation reveals significant drug trafficking by the named individuals.

2. There is reasonable cause to believe that the above described returns and return information may be relevant to an investigation or proceeding concerning this violation. Information in the return and return information will disclose evidence pertaining to potential sources of income or of the target's lack of reported income.

3. The returns or return information are sought for use in an investigation or proceedings (not involving tax administration) concerning this violation.

4. The information sought to be disclosed cannot reasonably be obtained, under the circumstances, from another source.

In addition to applicant:

<u>Name</u>	<u>Title</u>
Gretchen C.F. Shappert	United States Attorney
Edward R. Ryan	First Assistant United States Attorney
Michael E. Savage	Assistant United States Attorney, Criminal Chief
Todd Elmore	Bureau of Immigration and Customs Enforcement
Joe Barringer	Bureau of Immigration and Customs Enforcement
Chris Shuskey	Iredell County Sheriff's Department

are personally and directly engaged in investigating the above mentioned violation. This information is sought solely for this investigative purpose. No disclosure will be made to any other person except in accordance with the provisions of 26 U.S.C. § 6103 and 26 C.F.R. 301.6103(I). Therefore, applicant prays that this Court enter the proposed order for disclosure of returns and return information, and the proposed order to seal this application and future reference to this matter.

Respectfully submitted, this 19 Day of January, 2006.


GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY